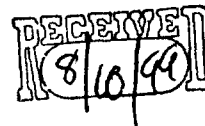


# PREMIER DIRECT<sup>INC.</sup>

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July 27, 1999

Office of Special Nutritionals (HFS-450)  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
200 C Street, SW  
Washington, D.C. 20204



RE: 21 U.S.C. Section 343(r)(6) Notification of Statements on Dietary Supplements

Dear Sir/Madam:

I hereby notify the Food and Drug Administration ("FDA") of the use of statements of nutritional support in the labeling of Longevity Complex, a dietary supplement. Premier Direct, Inc. is a manufacturer of Longevity Complex.

Statements Being Made in the Labeling of Longevity Complex

- (1) Help you support youthful good health
- (2) renewed vitality
- (3) Support healthy memory and brain function
- (4) Bolster your immune system
- (5) Help vitalize the body, promoting natural, youthful good health
- (6) Trigger an increase in your overall feeling of well-being
- (7) Bolster your immune system and help your body stay healthy
- (8) helps support normal testosterone levels
- (9) you'll increase your vitality
- (10) Pregnenolone ... may be one of the most potent memory enhancers.
- (11) Pregnenolone ... supporting healthy memory, mood, energy and immunity.
- (12) Lipoic Acid is used to confer protective benefits against free radicals. It has also been shown to protect tissues from the damage associated with low oxygen supply.
- (13) Reishi Mushroom ... help to support blood pressure function and cholesterol levels.
- (14) may help "support" your natural defense system.

To the best of my knowledge, and based upon information and belief present at the time of executing this notice, I certify that this information is accurate and complete and Premier Direct, Inc. possesses substantiation that the statements are truthful and not misleading.

VP

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